MODULE VII - CORRECTIVE ACTION PROGRAM FOR SOLID WASTE MANAGEMENT UNITS SCHEDULE OF COMPLIANCE

VII.A. RCRA/CERCLA INTEGRATION

VII.A.1. BACKGROUND INFORMATION

VII.A.1.a. Pursuant to the Utah Solid and Hazardous Waste Act, Utah Code § 19-6-107, the Director of the Division of Waste Management and Radiation Control (Director), is authorized to review, approve, disapprove, or revoke hazardous waste plans and enforce rules, including plans to investigate and institute corrective action at any Solid Waste Management Unit (SWMU).

VII.A.1.b. Pursuant to Section 3004(u) of RCRA, as amended by the Hazardous and Solid Waste Amendments (HSWA), the Utah Solid and Hazardous Waste Act, and Utah Admin. Code (UAC) R315-264-101, the Permittee shall institute a Corrective Action Program for all releases of hazardous wastes or constituents from any SWMU at the Tooele Army Depot – North (TEAD-N) facility, regardless of when the waste was placed in the SWMU.

VII.A.1.c. Attachment 23 provides a summary of the regulatory history of TEAD and RCRA/CERCLA integration under the Federal Facilities Agreement (FFA).

VII.A.1.d. UDEQ has reserved its right to require corrective action in accordance with the Utah Solid and Hazardous Waste Act and any claim for natural damages. UDEQ, or the Director on behalf of UDEQ, may exercise that right if the Director does not agree with a determination made pursuant to the dispute resolution provision of the TEAD-N FFA, Section 15. In that event, this Permit may be modified to specify corrective action requirements, if not already addressed in this Module VII.

VII.B. CORRECTIVE ACTION PROGRAM

VII.B.1. Under the authority granted to the Director pursuant to RCRA and the Utah Solid and Hazardous Waste Act, the Permittee shall implement a Corrective Action Program in accordance with Utah Admin. Code R315-264-90 through 101 for each SWMU listed in Table VII-1 in a manner that:

VII.B.1.a. Minimizes the need for further maintenance; and

VII.B.1.b. Controls, minimizes, or eliminates, to the extent necessary to protect human health and the environment, post-closure escape of hazardous waste, hazardous constituents, leachate, contaminated run-off, or hazardous waste decomposition products to the ground or surface waters or to the atmosphere.

VII.B.1.c. The Director may require the Permittee to add additional SWMUs to those listed in Table VII-1 in accordance with permit modification requirements specified in Condition I.D.5, based on information received by the Permittee, the Director, or any other knowledgeable source as specified in Condition VII.D.

VII.B.2. The Corrective Action Program shall include environmental investigation and interim and corrective measures as necessary that address releases of hazardous wastes or hazardous constituents from each SWMU and as specified in Condition VII.B.1.c.

VII.B.3. Flexibility in the corrective action process may be allowed to promote efficiency. The Permittee may, upon written approval by the Director, group SWMUs together under a single plan. The Permittee may also, upon written approval by the Director, combine or remove elements of a Corrective Action Program, as outlined in Condition VII.B.2, for a SWMU or group of SWMUs.

VII.C. CORRECTIVE ACTION PROGRAM STANDARD CONDITIONS

VII.C.1. The Permittee shall submit to the Director, for written approval, all Corrective Action Program documents, including studies, plans, reports, and schedules, that are required in Module VII, Module VIII, Module IX, and Module X, per the requirements of Condition I.BB. and Condition I.DD. If the Director finds that any Corrective Action Program document is inadequate to protect or to document protection of human health and the environment, the Permittee shall revise and resubmit the document within the time frame specified by the Director. Upon written request by the Permittee, the Director may approve, in writing, an extension to any date to submit a revised Corrective Action Program document.

VII.C.2. As necessary, the Permittee shall prepare and implement additional plans, or changes to the existing plans required in Module VII, Module VIII, Module IX, and Module X, to address unforeseen changes in the CAP. New or updated plans shall be submitted to the Director, for written approval, per the requirements of Condition VII.C.1.

VII.C.2.a. All new and updated plans as approved by the Director shall be incorporated by reference into the Permit, and shall be maintained in the Operating Record, per the requirements of Condition VII.C.5.

VII.C.3. All plans required in Module VII, Module VIII, Module IX, and Module X shall identify site-specific procedures for containment and classification of any hazardous waste that is expected to be generated. The Permittee shall manage waste generated as a result of corrective action activities in a manner to minimize dispersion of the waste to the environment. The Permittee shall characterize all waste within ninety (90) days of generation or excavation.

VII.C.4. The Permittee shall comply with all final studies, plans, reports, and schedules required by the conditions in Module VII, Module VIII, Module IX, and Module X and approved by the Director in writing. The Permittee's noncompliance with Director approved plans and schedules shall be deemed noncompliance with this Permit and may be subject to enforcement action.

VII.C.5. The Permittee shall maintain in the Operating Record all Corrective Action Program documents, all raw data such as laboratory reports, drilling logs, bench-scale or pilot-scale data, and all other supporting information gathered or generated during corrective action activities undertaken pursuant to conditions in Module VII, Module VIII, Module IX, and Module X, in accordance with Condition I.O.2.

VII.D. RELEASE NOTIFICATION REQUIREMENTS AND ASSESSMENT OF NEWLY IDENTIFIED SOLID WASTE MANAGEMENT UNITS

VII.D.1. The Permittee shall notify the Director in writing within 30 days of discovery of any newly identified sites the Permittee believes may meet the definition of an AOC (Area of Concern), HWMU (Hazardous Waste Management Unit) or SWMU. Upon notification, the Director and the Permittee shall schedule a visit to the site(s). During the site visit, the Permittee shall present available information about the site as needed to justify a decision about how to manage the site. These decisions include: 1) a determination that the site is not an AOC, HWMU or SWMU; 2) a determination that the site will be addressed through the process outlined in Condition VII.G for interim measures; 3) a determination that a newly identified AOC or SWMU needs to be added to Table VII.1, and that the Permittee must include the new AOC or SWMU in the RCRA Facility Investigation (RFI) program as described in Condition VII.E; or 4) the site will be referred to USEPA to address under CERCLA.

VII.D.2. Within 14 days of receipt of the Director's written decision to address the release under this Permit as described in Condition VII.D.2, the Permittee shall provide a schedule to the Director, for written approval, for submittal of:

VII.D.2.a. A RFI workplan in accordance with Condition VII.E if the Director determines that the release is a newly identified SWMU, HWMU, or AOC; or

VII.D.2.b. An Interim Measures Plan in accordance with Condition VII.G. if the Director determines that the release poses an immediate threat to human health or the environment.

VII.D.3. Within 60 days of receipt of the Director's written decision to declare the release a newly identified SWMU, HWMU, or AOC, the Permittee shall initiate a modification to the Permit, in accordance with Condition I.D.5, to incorporate the new SWMU, HWMU, or AOC into the Permit.

VII.E. RCRA FACILITY INVESTIGATIONS

VII.E.1. The Permittee shall conduct a RCRA RFI to determine the nature, magnitude, and extent of known and suspected releases of solid and hazardous wastes and constituents from each SWMU managed pursuant to the Permit, the Utah Solid and Hazardous Act, and Utah Admin. Code R315. The data collected during the RFI shall be used to support the evaluation of risk to human health and the environment and natural resources and a final site recommendation as described in Condition VII.F.2.a. for each SWMU or a group of SWMUs. The Permittee shall provide a RFI evaluation that supports a determination for additional investigation, no further action, interim measures, corrective measures, or site management for each SWMU investigated. The final RFI report also acts as a final decision document for each site (i.e., no further action, remediation, etc.) and may be presented to the public for comment.

VII.E.1.a. The Permittee shall also conduct a RFI for newly identified releases not associated with an existing SWMU.

VII.E.1.b. The Permittee shall conduct each RFI in accordance with the RFI Compliance Schedule specified in Table VII-2.

VII.E.1.b.i. The RFI Compliance Schedule may be modified in accordance with Condition VII.M.

VII.E.2. The Permittee shall prepare and submit to the Director, for written approval, a Phase I RFI Workplan, as specified in Appendix VII-A, for each SWMU or newly identified release in accordance with Conditions VII.E.1 and VII.E.1.a.

VII.E.2.a. Following completion of the Phase I RFI activities, the Permittee shall prepare and submit to the Director, for written approval, a Phase I RFI Report, as specified in Appendix VII-A, Task I.B, for each SWMU or newly identified release(s) identified in Condition VII.E.2. The Phase I RFI Report shall include:

VII.E.2.a.i. All data collected during the RFI, including Quality Assurance/Quality Control (QA/QC) information, and other relevant data;

VII.E.2.a.ii. An analysis and summary of the investigation describing the nature, magnitude, and extent of contamination at the site;

VII.E.2.a.iii. Maps, photos, and diagrams as appropriate to show the site, sample locations, and other relevant features;

VII.E.2.a.iv. Background concentrations of naturally occurring compounds as appropriate;

VII.E.2.a.v. A discussion on data gaps and the need for collecting additional samples, if needed.

VII.E.3. If the Director or the Permittee determines that additional information or sample data is needed, per Condition VII.F.2.a.v, the Permittee shall conduct a Phase II RFI in accordance with Appendix VII-A, Tasks II through IV.

VII.E.3.a. The Permittee shall prepare and submit to the Director, for written approval, a Phase II RFI Workplan, as specified in Appendix VII-A.2.

VII.E.3.b. The Permittee shall conduct the RFI activities outlined in the approved Phase II RFI Workplan, as specified in Appendix VII-A, Task III.

VII.E.3.c. The Permittee shall prepare and submit to the Director, for written approval, a Phase II RFI Report, as specified in Appendix VII-A, Task IV. The Phase I RFI Report requirements in Condition VII.F.2.a apply to the Phase II RFI Report.

VII.E.3.d. The Permittee shall prepare and submit to the Director, for written approval, a Human Health and Ecological Risk Assessment for each SWMU or group of SWMUs, and newly identified release(s), per the requirements outlined in Utah Admin. Code R315-101.

VII.E.4. Based on the results of the RFIs and the Human Health and Ecological Risk Assessment, the Permittee shall recommend one of the following actions for each SWMU, group of SWMUs, or newly identified release in the Phase I or II RFI Report:

VII.E.4.a. No further action as defined in R315-101 of the Utah Admin. Code and as specified in Condition VII.F;

VII.E.4.b. Interim measures as defined by R315-101 of the Utah Admin. Code and as specified in Condition VII.G;

VII.E.4.c. Corrective measures as defined in R315-101 of the Utah Admin. Code and as specified in Condition VII.H; or

VII.E.4.d. Post-closure care as defined in R315-101 of the Utah Admin. Code and as specified in Condition VII.J.1.

VII.E.5. If the Permittee recommends corrective measures for a specific SWMU or group of SWMUs, or newly identified release, the Phase I or Phase II RFI Report shall include an evaluation of possible corrective measures technologies and recommend a technology or remedy. The recommendation shall serve as the Statement of Basis specific in Appendix VII-B Task VI.

VII.E.6. The Director may approve the corrective measures technology recommended in the Phase I or Phase II RFI Report or may require a more extensive evaluation of possible remedies through a Corrective Measures Study (CMS) and submittal of a CMS Report.

VII.F. DETERMINATION OF NO FURTHER ACTION

VII.F.1. At any time during an investigation of a SWMU, the Permittee may petition the Director for a determination of no further action (NFA) for a SWMU that does not require corrective action as defined in R315-101 of the Utah Admin. Code.

VII.F.2. The NFA petition shall contain information based on the RFI that demonstrates that there are no releases of hazardous waste or hazardous waste constituents from the SWMU, or if there are releases, that the releases are below risk exposure criteria as identified in Utah Admin. Code R315-101.

VII.F.3. Notwithstanding a NFA determination in accordance with Condition VII.G.1, the Director may rescind at any time based on information that demonstrates a release or potential release. If a NFA is rescinded, the Permittee shall modify the Corrective Action Schedule of Compliance in accordance with Condition VII.M and conduct further investigation in accordance with this Permit.

VII.G. INTERIM MEASURES

VII.G.1. If, during any corrective action activity initiated in under this Permit, the Director or the Permittee determines that a release or potential release of hazardous waste or hazardous waste constituents from a SWMU poses an immediate threat to human health or the environment, the Permittee shall conduct specific interim measures as described in Condition VII.G.

VII.G.2. In determining whether an interim measure is required, the Director may consider the following:

VII.G.2.a. Time required to develop and implement an interim remedy:

VII.G.2.b. Actual and potential exposure of human and environmental receptors;

VII.G.2.c. Actual and potential contamination of drinking water supplies and sensitive ecosystems;

VII.G.2.d. The potential for further degradation of the medium without interim measures;

VII.G.2.e. Presence of hazardous waste that may pose a threat of release;

VII.G.2.f. Presence and concentration of hazardous waste including hazardous waste constituents in soils that have the potential to migrate to groundwater or surface water.

VII.G.2.g. Weather conditions that may affect the current levels of contamination;

VII.G.2.h. Risks of fire, explosion, or accident; and

VII.G.2.i. Other situations that may pose threats to human health and the environment.

VII.G.3. Within 45 days of receiving the written notification from the Director requiring Interim Measures, the Permittee shall submit an Interim Measures Plan to the Director, for written approval, that identifies specific actions to be taken to implement the interim measures and a schedule for implementing the required measures. The Interim Measures Plan shall include, at a minimum, the following:

VII.G.3.a. Objectives of the interim measures, including how the measure is mitigating a potential threat to human health and the environment, how it is consistent with and integrated into any long-term remedy at the facility, or both;

VII.G.3.b. Data collection quality assurance and data management information;

VII.G.3.c. Design plans and specifications, construction requirements, operation and maintenance requirements, project schedules, and final design documents;

VII.G.3.d. Construction quality assurance objectives, inspection activities, sampling requirements, and documentation; and

VII.G.3.e. A schedule for submittal of the following reports: progress reports, final design documents, draft interim measures report, and final interim measures report.

VII.G.4. Upon written approval of the Interim Measures Plan, the Permittee shall conduct Interim Measures in accordance with the plan approved by the Director.

VII.H. CORRECTIVE MEASURES STUDY and CORRECTIVE MEASURES IMPLEMENTATION

VII.H.1. If, under Condition VII.E.6., the Director requires a more extensive evaluation of possible corrective measures technologies for a SWMU or group of SWMUs, the

Permittee shall conduct a CMS in accordance with the requirements specified in Appendix VII-B (Tasks I, II, and III).

VII.H.1.a. As specified in Condition VII.H.1, the Permittee shall submit a CMS to the Director for written approval. In the CMS, the Permittee shall tabulate and rate the corrective measures alternatives for treatment or other remediation of the contamination at the SWMU or group of SWMUs in accordance with the requirements Appendix VII-B Task II, and the Permittee shall recommend a treatment alternative in the conclusion of the report per the requirements of Appendix VII-B Task III.

VII.H.1.b. The CMS shall include a Statement of Basis specific in Appendix VII-B Task VI.

VII.H.2. Upon the Director's written approval of the CMS Report and agreement on the recommended corrective measures alternative, the Permittee shall submit to the Director, for written approval, a Corrective Measures Implementation (CMI) Plan as specified in Appendix VII-B Task IV.A.

VII.H.3. Upon the Director's written approval of the CMI Plan, the Permittee shall implement the CMI Plan specified in Appendix VII-B [the corrective measures design (Task IV.B) and construction of the corrective measures (Task IV.C)].

VII.H.4. At the completion of construction of the corrective measures, the Permittee shall submit a Corrective Measures Construction Report to the Director for written approval as specified in Appendix VII-B Task V.B.

VII.H.5. The Permittee shall conduct the CMS and CMI Plan activities outlined in Appendix VII-B according to the schedule specified in Table VII-4. The compliance schedule may be modified in accordance with Condition VII.M.

VII.I. CORRECTIVE MEASURES COMPLETION CRITERIA

VII.I.1. The Permittee shall comply with the risk-based cleanup and closure standards specified in Utah Admin. Code R315-101 for all SWMUs for which remediation or removal of hazardous constituents to background levels will not be achieved.

VII.I.2. The corrective measures completion criteria shall be based upon an assessment, conducted in accordance with Utah Admin. Code R315-101, of human health and environmental risk posed by remaining hazardous constituents present on the site that have not been remediated to background levels.

VII.I.2.a. The Permittee may petition the Director for written approval to cease corrective measures and approve corrective actions completed either with or without site management for a SWMU. The Permittee shall demonstrate that contaminants associated with the SWMU pose minimal human health and environmental risks

and meet residential or industrial land use standards as outlined in Utah Admin. Code R315-101.

VII.I.2.b. The Permittee may submit a Technical Impracticality petition to the Director for written approval to cease corrective measures at any SWMU where corrective measures operations have become ineffective at removing contaminant mass and reducing contaminant concentrations. The Permittee shall place any SWMU that does not meet the requirements for a NFA into post-closure care, as outlined in Condition VIII.A.1.

VII.J. SITE MANAGEMENT PLANS

VII.J.1. The Permittee shall manage, through post-closure care, any SWMU or group of SWMUs that cannot be closed in a manner that meets the requirements for NFA in Utah Admin. Code R315-101. Post-closure care requirements for each SWMU shall be outlined in a Site Management Plan (SMP), approved by the Director in writing, to control ongoing risks to human health and the environment per the requirements of Utah Admin. Code R315-101.

VII.J.2. The SMP shall meet the requirements of Utah Admin. Code R315-101 and at a minimum include the following:

VII.J.2.a. A description of the SWMU and summary of the site characterization as described in the RFI Report or CMI Report, including a summary of the magnitude, nature, and extent of the contamination;

VII.J.2.b. A summary of the conclusions of the Human Health and Ecological Risk Assessment, including identification of all potential receptors, and a conceptual model that describes the actual and potential human and environmental impact(s) from the residual contaminants at the site;

VII.J.2.c. A detailed description of how the risk at the SWMU will be managed to protect human health and the environment through land use controls (e.g., fencing, inspection, maintenance, monitoring, etc.);

VII.J.2.d. An inspection program that will be used to monitor the SWMU or group of SWMUs to ensure that the site conditions have not changed and that the site conceptual model is still appropriate. The inspection program shall include, at a minimum, a description of what will be inspected, the inspection frequency, a description of what the inspector should evaluate, how to document and resolve problems, and an inspection checklist;

VII.J.2.e. Inspections shall either follow a site-specific checklist as included in the SMP or the generic inspection checklists in found in Attachments 25, 26, 27, or 28.

VII.J.2.f. Photos and figures, as needed, to describe the SWMU or group of SWMUs, show the location, explain access, and highlight distinctive features;

VII.J.2.g. For sites not under control of the Permittee, a draft environmental covenant developed in accordance with Utah Code Section 57-25-101 *et seq*., and;

VII.J.2.h. A legal description and survey plat of the property.

VII.J.3. A draft SMP is subject to public participation as required by Utah Admin. Code R315-101.

VII.J.4. The Permittee shall implement the SMP within thirty (30) days of receipt of written approval by the Director. If approval of the SMP or environmental covenant is delayed, the Director may require the Permittee to begin inspection, maintenance, monitoring, or other activities prior to SMP approval.

VII.K. MODIFICATION OF THE CORRECTIVE ACTION SCHEDULE OF COMPLIANCE

VII.K.1. The Permittee shall submit any request for modification of the final compliance dates pursuant to the Permit conditions in Module VII to the Director for written approval. Final compliance dates in the Corrective Action Schedule of Compliance are specified in Tables VII-2 and VII-3.

VII.K.2. The Permittee may modify the compliance schedules specified in Tables VII-2 and VII-3 in accordance with Permit modification requirements as specified in Module I.D.5, if the Director determines that good cause exists.

VII.K.2.a. Failure to receive adequate funds which were requested to conduct the CMI Plan may be considered good cause for modification of the compliance schedule(s), as specified in Condition VII.M.2.

VII.K.2.a.i. The Permittee shall use its best effort to secure all funds that may be required for implementation pursuant to the compliance schedule in Tables VII-2 and VII-3.

VII.K.2.a.ii. Immediately upon failure to obtain adequate funding, the Permittee shall submit to the Director a written request and justification for modification of the compliance schedules specified in Tables VII-2 and VII-3. The written justification shall demonstrate that good cause exists, pursuant to Condition VII.K.2. The Permittee shall document in the justification its efforts to obtain adequate funding. The Permittee shall also provide an alternate schedule of compliance for conducting the CMI, and an assessment of the human health and environmental impact for delaying the CMI activities, for the subsequent fiscal year.

VII.K.2.b. For any Director approved modification, the compliance schedules specified in Tables VII-2 and VII-3 shall be modified to provide relief from the original compliance schedule timeframes only for the subsequent fiscal year. All successive compliance dates after the end of such fiscal year shall be modified to reflect the original timeframes specified prior to the modification request.

VII.K.2.c. Failure to obtain adequate funds or appropriations from Congress shall not in any way release the Permittee from its obligation to comply with the CMI Plan or any other requirement of this Permit.

VII.K.2.d. If adequate funds for CMI are not available, the Director reserves the right to pursue any actions deemed necessary to protect human health and the environment, not excluding judicial recourse or termination of this Permit.

VII.K.3. The Permittee may submit to the Director for written approval, a request for interim compliance dates that do not affect the final compliance dates.

TABLE VII-1
TOOELE ARMY DEPOT – NORTH
SWMU LIST

SWMU [1,2]	TEAD-N SITE	AREA [3]	COMMENT
2	Former Industrial Wastewater Lagoon (IWL)	Revetment	Site-specific Inspection Form
11	Laundry Effluent Pond	Ammo	Form A
12	Pesticide Disposal Area	Landfill	Site-Specific
15	Sanitary Landfill	Landfill	Site Specific
29	Drum Storage Area	BRAC	Form A
37	Contaminated Waste Processing Plant	Ammo	Form A
45	Stormwater Holding Pond	Admin	
46	Used Oil Dumpsters	BRAC/Admin	Buildings 522, 602, 611, and 619
48	Old Dispensary Discharge	Admin	Building 400
51	Chromic Acid/Alodine Drying Beds (Building 623)	BRAC	Form A
58	Landfill and Industrial Area Vadose Zone Sources and Groundwater Plume	BRAC/Landfill	Landfill, Buildings 615, 620, 679, and C Avenue Outfall

NOTES:
[1] SWMU addressed under RCRA post closure; sites listed in Attachment 2 of the FFA.
[2] The DWMRC is the lead agency for all RCRA SWMUs. RCRA SWMUs are outside the scope of the FFA, as noted in Attachment 2 of the FFA, provided as Appendix VII-C. Sites, or source areas, where USEPA is lead regulatory agency and are being addressed under CERCLA (Attachment 1 of the FFA) include Source Areas 5, 6, 7, 8, 9, 13, 17, 18, 22, 23, 31, 32, 33, 35, 36, 40, and 41.
[3] SWMUs are located either on the TEAD-N facility (on-Depot) or on the BRAC Property. On-Depot areas include the ammunition/ordnance area (Ammo), the revetment area, the landfill area, and the administrative area (Admin). BRAC Property areas include the former TEAD-N industrial area (BRAC) and areas formerly used for administration (BRAC-A).

ACRONYMS:
BRAC = Base Realignment and Closure
CERCLA = Comprehensive Environmental Response, Compensation and Liability Act (Superfund)
DWMRC = Division of Waste Management and Radiation Control
FFA = Federal Facilities Agreement
RCRA = Resource Conservation and Recovery Act
SWMU = Solid Waste Management Unit

TABLE VII-2
RCRA FACILITY INVESTIGATION COMPLIANCE SCHEDULE

	RFI ACTIVITY	DUE DATE
	Submit Phase I RFI Workplan (Task I.A) (for SWMUs with suspected releases, and newly identified SWMUs)	Within ninety (90) days of the effective date of this Permit
	Submit Phase I RFI Report (Task I.B)	Within two hundred seventy (270) days of the Director's approval of the Phase I RFI Workplan
	Submit Phase II RFI Workplan and Schedule (Task II)	Within ninety (90) days of the Director's approval of the RFI – Phase I Report
	Initiate Phase II RFI activities (Task III)	Within sixty (60) days of the Director's approval of the Phase II RFI Workplan and Schedule
	Submit Draft RFI – Phase II Report (Task IV)	As specified in the Director-approved Phase II RFI Workplan and Schedule
	Submit Final Phase II RFI Report (Task IV) and Progress Reports (Task V)	As specified in the Director-approved Phase II RFI Workplan and Schedule

TABLE VII-3
CORRECTIVE MEASURES STUDY AND IMPLEMENTATION COMPLIANCE SCHEDULE

CMS SUBMISSION/CMI SUBMISSION	DUE DATE
Submit CMS Workplan (Task I)	Within 60 days of the Director's approval of the Final RFI – Phase II Report
Submit Draft CMS Report (Tasks I, II and III) and Decision Document (Statement of Basis)	Within 300 days of the Director's approval of the CMS Workplan
Submit Final CMS Report (Tasks I, II, and III) and Decision Document/Statement of Basis (Task V)	Within 60 days of the Director's comments on the Draft CMS Report
Submit Draft CMI Plan (Task IV.A)	Within 90 days of the Director's approval of the Final CMS Report
Submit Final CMI Plan (Task IV.A)	Within 60 days of the Director's comments on the Draft CMI Plan
Submit Corrective Measures Design – Preliminary Design (Approximately 30% Complete) (Task IV.B)	Within 60 days of the Director's approval of the final CMI Plan
Submit Corrective Measures Design – Preliminary Design (Approximately 60% Complete) (Task IV.B)	As specified in the Director-approved CMI Plan
Submit Corrective Measures Design – Preliminary Design (Approximately 90% Complete) (Task IV.B)	As specified in the Director-approved CMI Plan
Submit Corrective Measures Design (Task IV.B)	As specified in the Director-approved CMI Plan
Submit Draft CQA Plan (Task IV.C)	As specified in the Director-approved CMI Plan
Submit Final CQA Plan (Task IV.C)	Within 60 days of the Director's approval of the Draft CQA

TABLE VII-3(continued)

CMS SUBMISSION/CMI SUBMISSION	DUE DATE
Start Construction of Corrective Measures	Within 60 days of the Director's approval of the Final CQA
Prefinal Inspection	As specified in the CQA Plan
Prefinal Inspection Report	Within 45 days of the Prefinal Inspection
Final Inspection	As specified in the Prefinal Inspection Report
Corrective Measures Construction Report (Task V.C)	Within 90 days following completion of construction